

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**UNITED STATES OF AMERICA** §

**VS.** § **NO. 4:20CR00212**

**DEBRA MERCER-ERWIN** §

**MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT DEBRA LYNN MERCER-  
ERWIN**

**RAFAEL DE LA GARZA** hereby moves this Honorable Court to withdraw as co-counsel to Debra Lynn Mercer-Erwin and in support thereof states as follows:

1. Counsel has been advised that attorney Joe White will be making an appearance as new counsel for Mrs. Mercer-Erwin.
2. Mrs. Mercer-Erwin still has two other attorneys representing her in this matter.
3. Counsel for the Government, Ernest Gonzalez, does not oppose this motion.
4. Counsel's withdrawal as co-counsel will not impact the scheduled trial in this matter.

WHEREFORE, Counsel, Rafael de la Garza, moves the court to withdraw as co-counsel for Defendant Debra Mercer-Erwin.

Respectfully Submitted,

/s/Rafael de la Garza  
**RAFAEL DE LA GARZA**  
**STATE BAR NO. 00789251**  
**6521 PRESTON ROAD, SUITE 100**  
**PLANO, TEXAS 75024**  
**rdelagarzalaw@yahoo.com**  
**TEL.: 214/740-1708**  
**FAX: 866/405-5699**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing instrument was served upon the Assistant United States Attorney assigned to the case on May 12, 2022 via email.

5/12/22

/s/ Rafael de la Garza  
**RAFAEL DE LA GARZA**

**CERTIFICATE OF CONFERENCE**

On May 11, 2022, I conferred with Counsel for the Government, Ernest Gonzalez, whom did not oppose this motion to withdraw as co-counsel.

5/12/22

/s/ Rafael de la Garza  
**RAFAEL DE LA GARZA**

